

**Exhibit 3**

**From:** Claire O'Brien  
**To:** [Yeung, Christopher](#); [Faith Gay](#)  
**Subject:** Re: MDL 3047 - NY Agency Discovery  
**Date:** Thursday, January 16, 2025 2:16:47 PM  
**Attachments:** [image001.png](#)

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[EXTERNAL]

Chris,

This is confirmed including our understanding that if the search terms are yielding outsized family members without hits then we will work collaboratively to solve that issue.

Many thanks,  
Claire

Claire O'Brien

Partner

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**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Thursday, January 16, 2025 11:05 AM

**To:** Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>

**Subject:** MDL 3047 - NY Agency Discovery

Claire,

Thank you for speaking yesterday and today. As discussed, the following New York agencies have agreed to Meta's hit target proposal as set forth in my 1/9/25 email, but at the following hit targets (deduplicated across custodians within agencies and not including family members):

Agency	Hit Target
Governor's Office	75K
DOH	95K
OMH	95K
CCF	95K
OCFS	75K

As noted in my 1/9 email, Meta and the agencies would work collaboratively to generate a combination of search terms and custodians in accordance with the guidelines set forth in that email. I understand that the agencies plan to run the broadest version of the search terms that Meta proposed on 1/14/25 for data ingestion purposes, so that the data can be transferred to an ediscovery platform for de-duping and to facilitate better and more efficient hit reporting. You said

that you might want to reach out if those terms bring up an outsized number of family members without hits. If you believe that is the case, please reach out and we can discuss.

Please confirm that this is consistent with our agreement by return email.

We also think we can let the Court know of our agreement with a joint email to chambers. We have drafted an email below. Please let us know if that is acceptable to you, and we can send it cc'ing you and Faith.

Best,

Chris

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Dear Judge Kang,

Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (“Meta”) and the Office of the Governor of New York write in advance of today’s Discovery Management Conference to report that the disputes referenced in the Joint Status Report, dated January 13, 2025 (ECF No. 1523), and briefed in the Joint Status Report, dated January 14, 2025 (ECF No. 1548) have been resolved. There are no longer any ripe disputes between Meta and the Council on Children and Families, Department of Health, Office of Children and Family Services, Office of Mental Health, and the Office of the Governor.

**Christopher Y. L. Yeung**

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